

The Honorable Marsha J. Pechman

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

KIMBERLY BOTTOMS, on behalf of herself
and all others similarly situated,

Plaintiff,

v.

BLOCK, INC. (F/K/A, SQUARE, INC.) (D/B/A,
CASH APP),

Defendant.

No. 2:23-cv-01969-MJP

**STIPULATED MOTION AND
~~PROPOSED~~ ORDER
EXTENDING CASE
DEADLINES**

Due to the parties' continued diligent efforts to complete discovery into Plaintiff's claims, Plaintiff Kimberly Bottoms ("Plaintiff") and Defendant Block, Inc. ("Block"), by and through their counsel, respectfully request that the Court (1) extend the September 6, 2024, fact discovery cutoff, and (2) extend the October 3, 2024, dispositive motions cutoff to October 23, 2024. In support of this request, the parties stipulate and agree as follows:

1. On August 2, 2024, the Court issued a Case Schedule Order setting a fact discovery cut off for Phase 1 for September 6, 2024, and setting a deadline for dispositive motions regarding the named plaintiff of October 3, 2024. Dkt. 27.

2. Following the Court's Case Schedule Order, the parties worked diligently to meet the Court's September 6, 2024 discovery deadline. The parties conferred on and prepared proposed factual stipulations for the purposes of Block's anticipated motion for summary judgment, which allowed the parties to narrow discovery during Phase 1 as contemplated during

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the April 16, 2024 status conference. The parties met and conferred to clarify and limit the scope of written discovery requests. The parties agreed on search terms for productions of both Plaintiff's and Block's documents. Both sides made document productions in August. Both sides conducted discovery with relevant third parties. On August 28, 2024, Block deposed the non-party who sent the allegedly illegal text to Plaintiff.

3. Block noted Plaintiff's deposition for September 6, 2024, and the parties reached an agreement on the location and the means of conducting that deposition. The morning of September 6, 2024, shortly before the scheduled start of Plaintiff's deposition, Plaintiff's counsel contacted Block's counsel to inform them that Plaintiff was unable to appear for her scheduled deposition due to illness.

4. The parties agreed on search terms for Block's search for relevant and responsive documents in response to Plaintiff's requests for production on September 5, 2024. Due to the volume of documents that hit on the agreed search terms, Block requires additional time, until September 20, 2024, to complete its review and production of documents.

5. The parties have agreed (subject to Court approval) to reschedule Plaintiff's deposition to Thursday, September 19, 2024.

6. The parties have further agreed (subject to Court approval) to extend the deadline for Block's anticipated motion for summary judgment until October 23, 2024 to permit time for receipt of Plaintiff's deposition transcript, which Block will need for the preparation of its motion for summary judgment.

7. The parties therefore stipulate and agree to the following proposed extended schedule, subject to the Court's approval:

Event	Current Date	Requested Date
Deadline to complete named plaintiff's deposition and Block's production of documents	September 6, 2024	September 20, 2024
Dispositive motions regarding the named plaintiff to be noted in accordance with LCR 7(d) and filed by	October 3, 2024	October 23, 2024

8. Based on the foregoing, the parties respectfully request that the Court grant their motion and extend the case schedule accordingly.

IT IS SO STIPULATED.

DATED this 13th day of September, 2024.

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Attorneys for Plaintiff

~~PROPOSED~~ ORDER

The Court GRANTS the Parties' Stipulated Motion. The case schedule is adjusted as follows:

Event	Former Date	Current Date
Deadline to complete named plaintiff's deposition and Block's production of documents	September 6, 2024	September 20, 2024
Dispositive motions regarding the named plaintiff to be noted in accordance with LCR 7(d) and filed by	October 3, 2024	October 23, 2024

IT IS SO ORDERED this 16th day of September, 2024.



HONORABLE MARSHA J. PECHMAN